

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES HAYDEN,

Plaintiff,

v.

2K GAMES, INC. et al.,

Defendants.

CASE NO. 1:17-cv-02635-CAB

JUDGE CHRISTOPHER A. BOYKO

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

In accordance with Federal Rule of Civil Procedure 26(c), Plaintiff James Hayden and Defendants 2K Games, Inc. and Take-Two Interactive Software, Inc. jointly move the Court to enter the attached Stipulated Protective Order. The parties anticipate that discovery in this case will require the production of documents, things, and testimony that may contain confidential, competitively-sensitive, or proprietary information. In the interest of expediting discovery, protecting confidentiality interests, and limiting disputes regarding access to such information, the parties have conferred and have agreed to the terms of the attached Stipulated Protective Order. In accordance with this Court's Standing Order governing Stipulated Protective Orders, the parties have done their best to track the Court's standard protective order, while giving due consideration to the specific interests and issues presented by this case. The parties have negotiated and agreed that the Stipulated Protective Order needs additional confidentiality levels and other administrative changes from the Appendix L to the Local Rules. A redline demonstrating the changes sought by the proposed order is attached. Therefore, the parties respectfully request that the Court grant this motion and enter the attached order.

DATED: August 6, 2019

/s/ Joshua L. Simmons

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CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2019, I electronically filed the foregoing Joint Motion for Entry of Protective Order with the Clerk of Court using the ECF system, which will send notification of such filing to all counsel of record, all of whom are registered ECF participants.

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